

Holly Street Landfill Comment Form

Send

This is an invitation for comments on the following draft final 100% remedial design documents: **Design Analysis Report, Construction Quality Assurance Plan, and design plans and specifications** for the Holly Street Landfill. Please send your comments by March 30, 2004 to:

Lucy McInerney
Department of Ecology
3190 160th Ave S.E.
Bellevue, WA 98008-5452



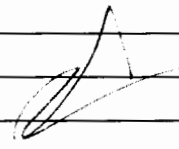
Name and address optional

Name..... J. Doudas
Address..... PO Box 4082
City..... Bellevue WA Zip Code 98227
E-mail Address.....

1. Do you have any comments about the remedial design described in the documents listed above? If so, please describe.

According to the business at City Hall this
is a fine waste of Government money. No trouble
leading has occurred in 90 years. Its time to just
leave it alone - leave it Be.

Do not disturb!



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Lucy McInerney
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Bellevue, WA 98008-5452

Name and address optional

Name..... Julie Carpenter
Address..... ~~913 Lakewood Drive~~ 101 Soundview Rd (home)
City..... Bellingham Zip Code..... 98229
E-mail Address..... julie.carpenter@remax.net

1. Do you have any comments about the remedial design described in the documents listed above? If so, please describe.

Design should include posting of large, graphic public notice - including final layout & grading plan, in a public access area during remediation. Thanks!

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98008-5452.

More information:

www.ecy.wa.gov/programs/tcp/sites/sites.html.

Reach Ericka Pizzillo at

ericka.pizzillo@bellinghamherald.com or call
715-2266.

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2024 Falcon Court
Bellingham, WA 98227

Dear Ms. McInerney:

My wife and I will move into our new Bellingham home at the above address in the first part of May, so this comment is from an about-to-be Bellingham resident.

We're strongly in favor of the overall cleanup of Bellingham Bay and its feeder streams. The article above makes a good case for working on Whatcom Creek.

Adding the boardwalk is a very nice touch ... especially if it connects to other trails and greenways. The more ordinary citizens we can entice down to the water, the more sensitivity will result in water quality issues.

Sincerely,



Thomas F. Olsen

March 29, 2004

State Dept of Ecology
3190 160th Ave SE
Bellevue, WA 98008-5452
Attn: Lucy McInerney

Ms. McInerney:

CC Bellingham City Planning Commission

Comment on the Holly Street boardwalk project, Bellingham, WA.

Thank you, and all others, involved with the conceptualization and development of this project. It is a very positive turn in an unfortunate history of pollution for this location.

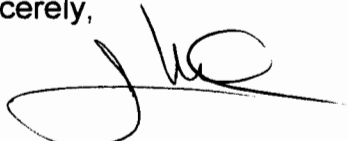
As for the design, my only comment is that this project should also include all the land currently occupied by the city owned Re Store building to the immediate north of the proposed boardwalk. I urge that the building be removed and the entire site be allocated to openspace/ riparian zone for Whatcom Creek.

My reasons:

- This would improve the overall aesthetics and balance of the space around the mouth of Whatcom Creek. Making this area more beautiful and people friendly also makes it more tourist friendly.
- This would allow more contaminated fill to be removed and result in a more complete cleanup of this site.

See attached letter to the Bellingham Planning Commission for some additional thoughts on the meaning of Whatcom Creek and the cleanup zone to Bellingham.

Sincerely,



Jim McClintock
1507 I Street
Bellingham, WA 98225
Hm/ Message: 360-671-6362

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February 4, 2004

To: City of Bellingham Planning Commission

Re: Amendments to area 10 and I OA

Sirs:

I would first like to voice my support for the position taken by the Lettered Streets Neighborhood Association. I urge you to retain view a special condition and keep height limitations to 3 stories/ 35'. The reasons supporting this are many. I would like to comment on two of these. 1. Area 10/ 10A as a waterfront with potential for being a gateway to views, open space and public access of shoreline and bay. 2. Area 10/ 10A as the setting for Whatcom Creek and Maritime Heritage Park. In addition, I ask that the Sash and Door site be incorporated into an expanded creek-side/ waterfront park with a vision that ties it to the waterfront futures planning.

The history of Bellingham's waterfront is one dominated by industry. The future should be one of gradual reclamation by the public. We need a common vision that incorporates both Area 10/ 10A and lands west of Roeder. Nothing has been more long denied to the public than open space and view along our waterfront. The city must work together with the Port to balance exclusive uses of waterfront, (such as the Bellwether), with simple open space and public view. Large industrial buildings have helped us lose sight, literally, of the natural treasure of Bellingham Bay and the San Juans. A high-rise version of Area 10/ 10A will help make that permanent. Think of view as not only Bellingham's view of the bay, but of Bellingham from the bay. Nothing since the first encroachment of houses on the Chuckanut skyline would change the historical view of Bellingham from the bay more than a row of high-rise buildings in this oldest core of our city shoreline.

Area 10/ 10A is also the setting for the mouth of Whatcom Creek. Bellingham's early beginnings center around Whatcom Creek and the water serving its people and industry flow from it. This watercourse ties Bellingham to Lake Whatcom and via a diversion channel, to the Middle Fork of the Nooksack whose headwaters flow from the Demming glacier of Mt Baker. Whatcom Creek deserves a vision greater than one of an open sewer running behind buildings and a narrow buffer zone bordering the Sash and Door site.

A long-range plan for Whatcom Creek should include a gradual restoration of a wide (riparian) zone with pathways throughout its entire length to include both sides of its mouth. The entire Sash and Door site should be dedicated to open space that balances and completes a park/ green space around the mouth of Whatcom Creek. This "Whatcom Waterfront Park" would tie in nicely with a renewed citizens dock for day mooring and a gradual reclamation of the waterfront to public and tourist access.

Please protect the historical and tranquil character of Old Town and the view enjoyed by the surrounding neighborhoods and city. Help combine a vision of a Whatcom Creek park with the future of Bellingham's waterfront.

Sincerely,

Jim McClintock

1507 I Street, Bellingham, WA 98225;

Hm/ Message: 360-671-6362



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Region 4 Office: 16018 Mill Creek Boulevard - Mill Creek, Washington 98012 - (425) 775-1311

March 29, 2004

Washington Department of Ecology
Northwest Regional Office
Attention: Lucy McInerney
3190 160th Avenue S.E.
Bellevue, Washington 98008-5452

**Subject: Washington Department of Fish and Wildlife Comments - Holly Street
Landfill Cleanup - Whactom Creek Estuary, Tributary to Bellingham Bay,
WRIA 01.9700**

Dear Mrs. McInerney,

The Washington Department of Fish and Wildlife (WDFW) has reviewed the plans and supporting documentation for the proposed Holly Street Landfill Cleanup project and offer the following comments for your consideration:

1. WDFW supports the proposed Holly Street Landfill Cleanup project as illustrated in your project plans dated February 2004.
2. WDFW would like to see the following provisions required as a condition of the MTCA Agreed Order administered by the Department of Ecology:
 1. The proposed Holly Street Landfill Cleanup project should be constructed as illustrated in your project plans dated February 2004. Changes to the proposed cleanup project should be subject to prior WDFW consultation and approval.
 2. Construction activity below the ordinary high water line should not occur from March 15 through July 15 of any year for the protection of migrating juvenile salmon. In addition, construction activity below the ordinary high water line should not occur when the construction area is tidally inundated from July 16 through August 31 of any year for the protection of migrating juvenile salmon.
 3. Fill and refuse materials removed from the site should be disposed at an appropriate landfill site or recycled where possible.
 4. The release of waste materials during construction activities should be controlled per the terms and conditions specified in the Construction Quality Assurance Project Plan.

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5. In-water excavation and capping should be held to an absolute minimum and should only be permitted at those limited sites where excavation and capping in the dry is not feasible.
6. Excavated surfaces subject to tidal inundation should be graded and rolled smooth prior to tidal inundation to reduce the potential for erosion.
7. Water quality in Whatcom Creek should be monitored per the terms and conditions specified in the Construction Quality Assurance Project Plan.
8. Based on the results of water quality monitoring in Whatcom Creek, turbidity best management practices (BMPs) should be required as determined necessary by either the City of Bellingham or the Department of Ecology.
9. Turbidity BMPs should be subject to the City of Bellingham and the Department of Ecology approval.
10. The caps should be designed and constructed as illustrated in your project plans to effectively isolate the landfill refuse from oxygenated water infiltrating from Whatcom Creek during high tide cycles.
11. The slope of the north shoreline of Whatcom Creek should not exceed a maximum slope of 3H:1V.
12. The slope of the south shoreline of Whatcom Creek should not exceed a maximum slope of 2H:1V.
13. The designed caps along the north and south shorelines of Whatcom Creek should be armored with the smallest rock material necessary to protect the caps from erosion.
14. Rock materials used to armor the cap along the north shoreline of Whatcom Creek should be top dressed with a top soil layer.
15. Rock materials used to armor the cap along the south shoreline of Whatcom Creek should be top dressed with a gravel layer.
16. Wherever possible, rounded rock and gravel should be used to armor and/or top dress the designed shoreline caps.
17. The upper shoreline areas along the north and south sides of Whatcom Creek that will have slopes of 4H:1V or steeper should be immediately covered with a biodegradable erosion control fabric.
18. Non native invasive vegetation should be removed from the upper shoreline areas along the north and south sides of Whatcom
19. The upper shoreline areas along the north and south sides of Whatcom Creek should be planted with native trees and shrubs as illustrated in the cleanup project plans.

20. The augmentation of the upland cap areas should not result in a net loss of aquatic habitat.
21. The grading and construction of the upland trail/boardwalk elements should not result in a net loss of aquatic habitat.
22. The upland boardwalk element that extends waterward of the ordinary high water line is not integral to the proposed MTCA clean up action and therefore will require a separate Hydraulic Project Approval (HPA).
23. The Holly Street Landfill Cleanup project should result in a net gain of intertidal estuarine habitat. Under no circumstances shall the cleanup project result in a net loss of intertidal estuarine habitat.
24. The proposed emergent marsh habitat bench should be created between the +10.0 and +6.0 tide elevations (MLLW = 0.00) and at a maximum 6H:1V slope as illustrated in the clean up project plans.
25. The proposed emergent marsh habitat bench between the +8.5 and +6.0 tide elevations (MLLW = 0.00) should be planted with native low marsh vegetation.
26. Large wood materials placed on the emergent marsh habitat bench should be installed without concrete anchors, located landward of the +8.5 tide elevation and sized to be stable during high tide cycles and stream flood flows..
27. Large wood materials placed waterward of the +8.5 tide elevation should be installed with anchors and configured and sized to be stable during high tide cycles and stream flood flows.
28. Under no circumstances shall pilings treated with creosote or other wood preservative be used for project construction waterward of the ordinary high water line.
29. The top elevation for the gravel berm associated with the proposed side channel element should not exceed the +8.0 tide elevation (MLLW = 0.00) as illustrated in the cleanup project plans.
30. The side slopes of the gravel berm associated with the proposed side channel element should not exceed a maximum slope of 2H:1V.
31. The gravel berm associated with the proposed side channel element should be constructed with quarried or native substrate materials. Under no circumstances should the gravel berm be constructed with construction debris or landfill materials.
32. Habitat performance monitoring should be implemented per the terms and conditions specified in the Project's Compliance Monitoring and Contingency Response Plan authored by Anchor Environmental 2002.

33. Cleanup compliance monitoring should be implemented per the terms and conditions specified in the Project's Compliance Monitoring and Contingency Response Plan authored by Anchor Environmental 2002.

WDFW appreciates the opportunity to provide the above comments regarding the proposed Holly Street Landfill Cleanup project. If you have any questions, please contact me at (360) 466-4345 extension 250.

Sincerely,

A handwritten signature in cursive script that reads "Brian Williams".

Brian Williams
Area Habitat Biologist

From: Wendy Steffensen [waters@re-sources.org]

Sent: Tuesday, March 30, 2004 4:57 PM

To: McInerney, Lucy

Subject: Holly St.

Wendy Steffensen

North Sound Baykeeper

RE Sources

1155 N. State St., suite 623

Bellingham, WA 98225

Lucy McInerney

Department of Ecology

3190 160th Ave. S.E.

Bellevue, WA 98008-5452

March 30, 2004

Dear Ms. McInerney:

Please accept these comments on the Design Analysis Report, February 2004, for Holly Street, on behalf of RE Sources and the North Sound Baykeeper.

I have a great deal of concern that the City has not obtained sufficient habitat restoration funding, as of the writing of the DAR (p.8). Much of the DAR is predicated on the assumption and very real hope that habitat restoration will be part and parcel of this clean-up. In the absence of habitat restoration, the clean-up may do very little good in terms of recovery of the area and the species which should be using it. Habitat restoration should be required to be part of the clean-up, as damage from the municipal landfill stems at least equally, if not more from the loss of physical habitat, than it does from the leaching of copper and zinc.

It is noted that the Technical Specification for the Holly Street Landfill Cleanup consists of excavation, backfilling, enhancement of an existing cap, and incorporation of a public access boardwalk, and a habitat restoration component. It is stated that the habitat restoration component is not necessary to achieve clean-up goals. I respectfully submit that the boardwalk is also not necessary to meet clean-up goals. In the interest of clean-up, habitat restoration trumps the incorporation of a boardwalk, and should be prioritized.

Improving park amenities and installing a boardwalk will help meet the goal of education and stewardship, but they will do nothing to actually improve on-the-ground habitat. The RE Store may be forced to relocate in order that the park amenities be developed. While moving the RE Store may, at some point, be inevitable and practical, forcing its move and putting in amenities, absolutely should not be done before available monies are used for habitat enhancement.

Table 8-1 lists the probable cost of construction. These costs should be broken out in terms of "necessary" remediation, habitat enhancement, and park/boardwalk amenities. It is not clear from the Table, what portion of money is needed for each specific goal.

Other Comments:

1) Use of Best Management Practices should not rely on monitoring results (p. 14). These should be in place prior to potential water quality excursions.

2) Will there be a need for ongoing maintenance to add/ incorporate fine-grained substrate? (p. 25)

3) Japanese knotweed is one of the invasive species that will be removed. If this has not already been done, please consult with Laurel Shiner at Whatcom County Noxious Weed Board on the removal of this invasive. Improper removal can actually lead to much worse infestations than currently exists. (p. 25, 27) If this plant takes hold it could destroy the riparian area we are trying to restore and be much more costly to eradicate.

Thank you for this opportunity to comment. I look forward to hearing your responses.

Sincerely,
Wendy S. Steffensen
North Sound Baykeeper

--

Wendy Steffensen
North Sound BayKeeper
RE Sources
1155 North State Street #623
Bellingham, WA 98225
(360) 733-8307
www.re-sources.org

From: Isaac Blum [IsaacB@lummi-nsn.gov]
Sent: Tuesday, March 30, 2004 2:28 PM
To: McInerney, Lucy
Subject: RE: Holly Street Landfill

Dear Ms. McInerney,

Thank you very much for providing the newsletter describing the status of the Holly Street Landfill Draft Final 100% Remedial Design Documents. The Lummi Nation Tribal Historic Preservation Office is reviewing all of the materials provided on Ecology's website. We look forward to reviewing this project under Section 106 of the National Historic Preservation Act (NHPA) and other applicable historic preservation laws in the future.

Thanks again,

~~~~~

Isaac Blum, Inter-Agency Liaison  
Lummi Nation Tribal Historic Preservation Office  
2616 Kwina Road, Bellingham, WA 98226  
360-384-2280 (p)/ 360-380-1850 (f)